

Message

From: Stahmann, Eric [eric.stahmann@walgreens.com]
Sent: 9/9/2015 11:19:04 AM
To: Daugherty, Patricia [patricia.daugherty@walgreens.com]; Bratton, Edward [edward.bratton@walgreens.com]
Subject: RE: Monthly DM webinars
Attachments: GFD DM Webinar.pptx

Here is the deck I created for my portion.

BTW I am on vacation Sept 21st for the first session, so I can do either the 2nd or the 3rd session.

From: Daugherty, Patricia
Sent: Tuesday, September 08, 2015 11:27 AM
To: Stahmann, Eric
Cc: Bratton, Edward
Subject: Re: Monthly DM webinars

Sure I can go in a pharmacy round here and take some pics.

Thanks

Patty

On Sep 8, 2015, at 11:16 AM, Stahmann, Eric <eric.stahmann@walgreens.com> wrote:

No problem; we can meet tomorrow.

Tasha wanted photos of the stickers attached to hard copies for examples (not sure if that is an easy get for you).

I can take the TD GFD checklist related questions (#5, #6 & #7)

- Eric

From: Daugherty, Patricia
Sent: Tuesday, September 08, 2015 9:36 AM
To: Stahmann, Eric
Cc: Bratton, Edward
Subject: Re: Monthly DM webinars

I'll be in later our air is out and the repair guy is here. I can take the stickering and log book section if no has a preference. Just send me an invite and we can meet to discuss.

Patty

On Sep 8, 2015, at 9:33 AM, Stahmann, Eric <eric.stahmann@walgreens.com> wrote:

Yes we should meet. Tasha just called me and asked who is taking the lead on this.

She wants the deck to her by end of this week (Friday).

PLAINTIFFS TRIAL
EXHIBIT
P-15085_00001

WAGMDL00037613

CONFIDENTIAL

From: Bratton, Edward
Sent: Monday, August 31, 2015 9:10 AM
To: Stahmann, Eric; Daugherty, Patricia
Subject: RE: Monthly DM webinars

Should we meet to come up with the outline?

Edward Bratton
Manager - Pharmaceutical Integrity
Walgreen Co.
200 Wilmot Road
Deerfield, IL 60015
Office: 847-315-2689
Cell: 224-226-9494

From: Polster, Natasha
Sent: Saturday, August 29, 2015 10:00 AM
To: Bratton, Edward; Stahmann, Eric; Daugherty, Patricia
Subject: FW: Monthly DM webinars

All-

Please see below. We have been given time on the Monthly DM webinars. I want an outline that breaks out the findings of the BCI (attached) into content enough for 3 webinars. You will have no more than 5 minutes to cover the slides (so 3-4 slides max per webinar). **The outline is due to me by Friday Sept 4.** Work together to decide what needs to be presented. If there isn't enough content for 3 webinars, then let's pick one or two more hot topics in regard to RxIntegrity and add those to the content of the meetings.

Let me know which of you is taking the first webinar, keep in mind each of you will get a turn. They are held on the third Monday of every month, so plan accordingly around your vacations, days off, etc. You will be responsible for working with the others as well as other BUs to ensure your content is accurate, going over deck with me, and getting deck to Sue Drelicharz on time.

Deck due date: Sept 15
Webinar date: Sept 21 (business dress)

I would like pictures associated with the slides for as much as we can.
For example: slides for issue #1, #2 ; Someone needs to go into a store and take a picture of a stickered hard copy of a CS, or a California folder full of stickered hard copies. Keeping in mind HIPAA and patient name/address will have to be blacked out on the slide deck somehow. Pictures are worth a thousand words. Plan this out so only one store visit is required for the minimum amount of disruptions to the store. Take a picture of the log book, stored hard copy files, etc. Be creative to make this interesting for the audience.

I have also attached a copy of the MOA as there could be things in there that we can use for content if we needs some idea.

Let me know if you have questions. One of the analysts could help build the deck as a development opportunity for them.

Thank you,

Tasha Polster, RPh
Walgreen Co.

Sr. Director, Pharmaceutical Integrity | Pharmacovigilance
847 315 3379

This message contains confidential quality information that is considered Patient Safety Work Product under federal law. Do not print, copy, discuss, or distribute in any form outside the Walgreens Patient Safety Evaluation System. Please delete this message upon completion of quality activities detailed within.

From: Drelicharz, Susan
Sent: Saturday, August 29, 2015 8:49 AM
To: Polster, Natasha
Cc: Arnold, Brian; Bratton, Edward; Stahmann, Eric; Daugherty, Patricia
Subject: Re: Monthly DM webinars

Hello

Next month's DM webcast will be 60 minutes, not 90. Since the Health Trade meeting is right before it (Sept. 18) flu and Med D will not be on the webcast agenda.

We'll hold 5 min for you. The deck is due on Sept. 15.

Thanks.

Sue

On Aug 29, 2015, at 7:48 AM, Polster, Natasha <tasha.polster@walgreens.com> wrote:

Brian/Sue-

Who owns the agenda for the pharmacy portion? RxIntegrity needs a few minutes the next few months, if possible.

We got the results of the business continuity investigation that AP did in regards to the stores following the MOA we signed with the DEA. We have some opportunities we need to address. I was thinking we would break it down into 2 or 3 of the monthly webcasts so we are not overwhelming them.

When would the deck be due. And I am assuming we would have 3-5 minutes, is that correct?

Thank you,

Tasha Polster, RPh
Walgreen Co.
Sr. Director, Pharmaceutical Integrity | Pharmacovigilance
847 315 3379

This message contains confidential quality information that is considered Patient Safety Work Product under federal law. Do not print, copy, discuss, or distribute in any form outside the Walgreens Patient Safety Evaluation System. Please delete this message upon completion of quality activities detailed within.



Good Faith Dispensing DM Webinar

Eric Stahmann

Rx Integrity Manager - Western Operations

©2015 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.



HIGHLY CONFIDENTIAL

WAGMDL00037616

P-15085_00004

Administrative Memorandum of Agreement (MOA)



Walgreens agreed to the following obligations:

“Walgreens to maintain a compliance program to detect and prevent diversion of controlled substances as required under the Controlled Substances Act (CSA) and applicable DEA regulations.

- ...includes procedures to identify the common signs associated with the diversion of controlled substances...”*
- ...implement and maintain policies and procedures to ensure that prescriptions for controlled substances are only dispensed to authorized individuals...”*



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

2

HIGHLY CONFIDENTIAL

WAGMDL00037617

P-15085_00005

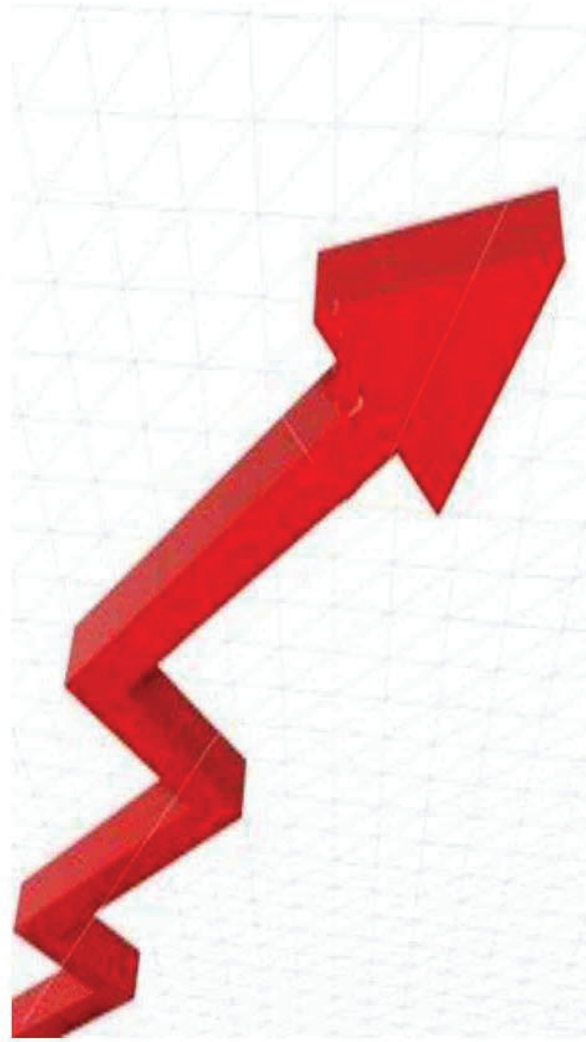
Basic Control Initiative (BCI)

In order to check if stores are compliant with the policies/procedures put in place per the MOA, a random sample size audit was conducted in June.

- Roughly 2,400 stores were audited for compliance on various Good Faith Dispensing (GFD) and Target Drug Good Faith Dispensing (TD GFD) policies and procedures
- Results were unfavorable



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.



3

HIGHLY CONFIDENTIAL

WAGMDL00037618

P-15085_00006

BCI Summary

When Target Drug prescriptions are dispensed, pharmacy team members are responsible for completing the Target Drug Good Faith Dispensing (TD GFD) Checklist.

Number of stores that correctly had a completed TD GFD Checklist attached to the **filled** TD prescription hard copies:
(2,407 stores audited)

- 1,432 stores (59.5% compliance rate)



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

4

WAGMDL00037619

HIGHLY CONFIDENTIAL

P-15085_00007

BCI Summary

If the pharmacist determines that a TD prescription does not meet GFD requirements, a copy of the refused prescription and completed TD GFD Checklist must be in the designated refusal file folder.

Number of stores that correctly had completed TD GFD Checklist attached to the **refused** TD prescription hard copies or copies:
(2,404 stores audited)

- 1,820 stores (75.7% compliance rate)



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

5

WAGMDL00037620

HIGHLY CONFIDENTIAL

P-15085_00008

BCI Summary

If the pharmacist determines that a TD prescription does not meet GFD requirements, a copy of the refused prescription and completed TD GFD Checklist must be in the designated refusal file folder.

After reviewing the refusal file folder for calendar year 2015, how many refused TD prescriptions were identified?

(2,405 stores audited)

- 1,160 stores had 0 refused prescriptions
- 271 stores had 1 refused prescription
- 502 stores had 2-5 refused prescriptions
- 233 stores had 6-10 refused prescriptions
- 176 stores had 11-25 refused prescriptions
- 63 stores had 26 or more refused prescriptions

* Most refused prescriptions = 336



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

6

WAGMDL00037621

HIGHLY CONFIDENTIAL

P-15085_00009

What We Need From Leadership

Leadership should be checking for compliance on a regular basis.

The decision to dispense a prescription is ultimately up to the pharmacist, however, proper documentation to support the decision is needed.

It's important that pharmacists document all actions taken during the Good Faith Dispensing process.



©2013 Walgreen Co. All rights reserved.

7

WAGMDL00037622

HIGHLY CONFIDENTIAL

P-15085_00010

What We Need From Leadership

During routine pharmacy walks

- Review TD-GFD refusal folder
 - Are there any recent refusals?
 - Are all required documents attached (ID, PDMP, checklist etc.)?
- Review recent California folder of CII's
 - Review target drugs and confirm checklist was complete, PDMP and ID are attached
- Randomly check on-hand levels of target drugs



©2013 Walgreen Co. All rights reserved.

8

WAGMDL00037623

HIGHLY CONFIDENTIAL

P-15085_00011

Thank You

WAGMDL00037624

HIGHLY CONFIDENTIAL

P-15085_00012